

REMARKS

Claims 1, 3-9, 11-17, and 19-20 remain for reconsideration. Claims 2, 10, and 18 have been canceled and their features have been moved into their respective base claims.

Claim 1 has been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,547,448 to Johnson.

Claims 2-4 and 7-15 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Johnson.

Claims 5-6, and 16-20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Johnson in view of published application US 2004/0190841 to Anderson.

These rejections are respectfully traversed based on the following discussion.

Briefly, the present invention is directed to a press-fit metal or ceramic sleeve that is placed inside of the female small form factor (SFF) receptacle to prevent the male portion of the connector, including a fiber optic tip, from making direct contact with the inner wall of the receptacle. SFF connectors are typically inexpensive with the inner wall of the receptacle typically made from soft injection molded plastic subject to wear. As shown for example in Figures

2B and 4, the protective sleeve 40 is press fit directly against the soft plastic 10. Further, as clearly shown in Figure 2B the sleeve may be flush with the opening.

All independent claims have been previously amended to recite that the sleeve is directly against the plastic and flush with the opening.

In contrast, the invention disclosed by the primary reference to Johnson does not teach or suggest a protective sleeve directly against the soft plastic material. To the contrary, referring to Johnson's Figure 1, Johnson discloses a composite material lined with a sheath 12. The "sleeve" 13 is then positioned within the sheath 12. Thus, the sleeve 13 is not against the softer plastic as claimed, but rather against the sheath 12. Thus, Anderson requires more parts and thus would be more costly to make, detracting from the low cost aspect of typical SFF connectors.

Further, as shown in Johnson's Figure 1, Johnson's "sleeve" 13 is not flush with the opening 10, but rather set back into the opening quite far. Thus, it appears that when inserting the male ferrule portion 15 it is likely that the tip of the ferrule would bang into or get caught up on the edge of the sleeve 13 making for more difficult alignment.

In response, the Examiner has argued that the independent claims "*still read on the structure of Fig.1 of Johnson , wherein the tubular sheath 12 can be considered as a sleeve placed in the interior composite structure 11 directly against an interior surface of it, and flush with the opening. The existence of*

an additional sleeve 13 used for alignment purposes does not negate the fact that the structure of Fig. 1 contains all of the positive limitations of claims 1, 9”.

However, it is respectfully submitted that the Examiner cannot analogize the sheath 12 of Johnson as being the claimed sleeve in one instance and then analogizing the claimed sleeve as being the sleeve 13 shown in Johnson in another instance.

Johnson contains two separate insertions within a composite structure, that is, the sheath 12 and the sleeve 13. Applicants claim only one insertion, that being a sleeve 49 in the form of a C-ring. Johnson appears to disclose that the sleeve 13 may have a C-section cross-shape (col. 4, lines 66-67). However, Johnson does not teach or suggest that its sheath 12 also comprises a C-shaped cross section. And, it is this sheath 12 that the Examiner argues is “directly against the injection molded plastic[and] is flush with the opening” as claimed.

In contrast, Applicant’s claim that it is the C-shaped sleeve that is against the injection molded plastic. Johnson does not teach or suggest any C-shaped member (sleeve or sheath) against the plastic.

Independent claim 1 has been amended to recite “a sleeve lining an inner wall of said opening directly against the material softer than said rigid support, and wherein an end of the sleeve is flush with the opening... said sleeve having a substantially cylindrical shape and having a C-shaped cross

section” (emphasis added).

Similarly, independent claim 9 has been amended to recite “fitting a sleeve flush within said opening directly against the plastic to protect said plastic from said rigid probe... said sleeve having a substantially cylindrical shape and having a C-shaped cross section” (emphasis added).

Finally, independent claim 16 has been amended to recite “a press fitted sleeve lining an inner wall of said opening directly against the injection molded plastic to protect said injection molded plastic from direct contact with probe, wherein an end of the sleeve is flush with the opening... wherein said press fitted sleeve comprises a generally cylindrical in shape having a C-shaped cross section” (emphasis added).

Having only one insertion, as opposed to Johnsons’ two insertions, Applicant’s claimed invention is inarguably simpler than that of Johnson which is highly desirable of a low-cost optical connector.

MPEP § 2131 mandates that “TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT IN THE CLAIM”.

Furthermore, the MPEP, citing *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1051, 1053 (Fed. Cir. 1987), states “[t]he identical invention must be shown in as complete detail as is contained in the... claim” (emphasis added).

It is therefore respectfully submitted that the rejections to the claims

are improper under Section 102 as Johnson cannot anticipate the rejected claims since they do not "teach the identical invention". Further, since the above highlighted features are not taught or suggested, Johnson does not set forth a basis for *prima facie* obviousness under Section 103. Based on the above discussion with reference to the MPEP guidelines, it is respectfully requested that the rejections based Johnson be withdrawn.

With regard to the rejections further based on Johnson in view of Anderson, the Examiner relies on Anderson merely for teaching the existence of LC and SC connectors. However, nothing in either Johnson nor Anderson teaches or suggests "fitting a sleeve flush within said opening directly against the plastic to protect said plastic from said rigid probe" as set forth in the claims. As such, it is respectfully submitted that this combination does not establish a case of *prima facie* obviousness over the amended claims.

Since the above features recited in the claims are not taught or suggested by the prior art of record. As such, it is respectfully requested that the outstanding rejections be withdrawn.

In view of the foregoing, it requested that the application be reconsidered, that claims 1, 3-9, 11-17, and 19-20 be allowed and that the application be passed to issue. Please charge any shortages and credit any overcharges to Intel's Deposit Account number 50-0221.

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Respectfully submitted,

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